

STATE OF SOUTH DAKOTA

IN CIRCUIT COURT

COUNTY OF BROWN

FIFTH JUDICIAL CIRCUIT

* * * * *

STANLEY BECKLER and
JANET BECKLER,

CIV 11

Plaintiffs,

COMPLAINT

-vs-

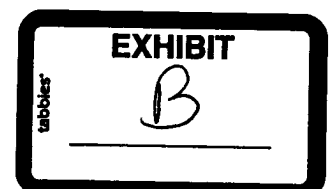
MERIDIAN CITIZENS MUTUAL
INSURANCE COMPANY,

Defendant.

* * * * *

Plaintiffs, by and through their attorney, Thomas P. Tonner, state and allege as follows:

1. Plaintiffs are husband and wife and currently reside at 13349 393rd Avenue, Brown County, South Dakota.
2. Defendant is a domestic insurance corporation organized and incorporated under the laws of the State of Indiana. Defendant is licensed and authorized to conduct business as an insurer in the State of South Dakota.
3. At all times pertinent hereto, Plaintiffs were the owners of personal property located at 13349 393rd Avenue in the County of Brown, State of South Dakota.
4. On or about November 1, 2007, Defendant issued to Plaintiffs an insurance policy by which it undertook to indemnify and compensate Plaintiffs for loss or damage to personal property located at the above address due to a fire.
5. At all times pertinent hereto, Plaintiffs were in full compliance with all terms and conditions of coverage required by the policy and had paid all premiums as they became due.
6. On or about March 19, 2008, Plaintiffs property was totally destroyed by a fire which occurred due to unknown causes. The loss occurred under circumstances within the coverage of the policy.
7. The value of the Plaintiffs' personal property lost in the fire is \$157,065.98. Of that loss, Defendant has paid to Plaintiffs the sum of \$44,017.52.



8. Plaintiffs provided Defendant with notice of loss and proofs of loss and duly complied with all of Defendant's claims procedures.

9. Demand has been made for the additional \$113,048.46 of claimed losses.

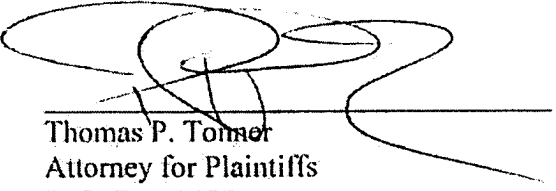
10. Defendant refused and continues to refuse to pay the additional losses as identified.

11. Plaintiffs are entitled to reasonable attorney fees pursuant to SDCL 58-12-3.

WHEREFORE, Plaintiffs pray for Judgment against the Defendant as follows:

1. A judgment requiring Defendant to pay Plaintiffs' claim in the total amount of \$113,048.46 in accordance with the terms of the policy plus prejudgment interest.
2. For reasonable attorney fees.
3. For costs and such other relief as this Court may deem just and equitable in the premises.

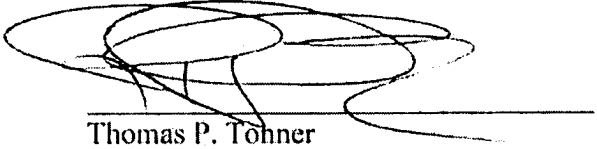
Dated this 30th day of June, 2011.



Thomas P. Töhrner
Attorney for Plaintiffs
P. O. Box 1456
Aberdeen, SD 57402-1456
(605) 225-1000

ENDORSEMENT

Plaintiffs demand trial by jury.



Thomas P. Töhrner